

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re)
) Chapter 11 Case No.
)
Lehman Brothers Holdings Inc., et al.,) 08-13555 (SCC)
)
Debtors.) Jointly Administered
)
)
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**DECLARATION OF PAUL V. SHALHOUB IN SUPPORT OF DEBTORS'
MOTION TO (A) DISALLOW AND EXPUNGE CERTAIN CLAIMS
FILED BY CITIBANK, N.A. AND WELLS FARGO, N.A. AND (B)
REDUCE RELATED CLAIMS RESERVE**

Paul V. Shalhoub, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a member of the bar of the State of New York and am admitted to practice before the United States District Court for the Southern District of New York. I am a partner at Willkie Farr & Gallagher LLP and counsel for Lehman Brothers Holdings Inc. (“LBHI” or the “Plan Administrator”) and Structured Assets Securities Corporation (“SASCO”) (together, “Lehman,” and collectively with their affiliated debtors in the above-captioned cases, the “Debtors”) in these cases.

2. I submit this Declaration in support of the Debtors’ Motion to (a) Disallow and Expunge Certain Claims Filed by Citibank, N.A. and Wells Fargo, N.A. and (b) Reduce Related Claims Reserve.

3. I base this declaration on my personal knowledge and on information obtained in the course of the above-captioned matters.

4. To the best of my knowledge, attached hereto are true and correct copies of the following documents:

<u>Exhibit</u>	<u>Description</u>
A	The Citibank Claims – Proof of Claim Numbers 22639 and 22775
B	The CDO Claims – Proof of Claim Numbers 32164 and 32166
C	Proof of Claim Number 32168
D	SASCO 2006-RM1, Mortgage Loan Sale and Assignment Agreement
E	SASCO 2006-RM1, Transfer and Servicing Agreement
F	SASCO 2006-RM1, Trust Agreement
G	SASCO 2006-RM1, Indenture
H	LMT 2008-3, Trustee Agreement
I	LMT 2008-3, Securities Purchase Agreement

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
June 29, 2016

By: /s/ Paul V. Shalhoub
Paul V. Shalhoub